

July 31, 2003

By Electronic Submission

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CC Docket 94-102 – Interim E911 Report of West Coast PCS, LLC

Attached, on behalf of West Coast PCS, LLC, is its Interim E911 Report.

Questions and correspondence can be addressed to:

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Respectfully submitted,

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INTERIM E911 REPORT OF WEST COAST PCS, LLC

West Coast PCS, LLC is the licensee of PCS stations KNGL245, KNLH726, KNLH727, and KNLH728. These licenses serve four California BTAs – Modesto, Sacramento, Stockton and Yuba City.

1. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid):

In California, the deployment of E911 is being managed by the California Department of General Services (DGS). Phase I and Phase II will be deployed concurrently. West Coast PCS has not yet received a request from any PSAP. In our discussions with the DGS, they have informed us that we will receive a request by the end of the year. However, the funding mechanism devised by the State of California is based on the number of subscribers. West Coast PCS is an extremely small wireless carrier, so the funding we will receive from the State will be negligible in comparison to our costs. Accordingly, because we cannot spread these costs across multiple markets or a large subscriber base, it is likely we will have no choice but to pass these costs through to our subscribers.

2. The carrier's specific technology choice (i.e., network-based or handset-based solution, as well as the type of technology used):

West Coast PCS uses Lucent CDMA equipment and plans to deploy a handset based solution for E911. In regards to potential problems, it should be noted that unfortunately, the amount of effort and support required to deploy an E911 platform is not materially affected by the size of the market or the subscriber base. Therefore, we face pricing structures that are designed for carriers many times our size in terms of subscribers and revenue. To manage our costs, we must consider acting as a systems integrator to get the best possible price for each part of the platform. This approach would be more time consuming and demanding than a turnkey approach.

3. If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets:

ALI-capable CDMA handsets are now generally becoming available to West Coast PCS. These are generally the most recently released handsets and as such, tend to be on the higher end of price relative to other models with similar feature sets. Based on offerings in the market, we believe that major handset manufacturers give substantial cost advantages to the major carriers on recently released products. In many cases (such as the Motorola T720) we cannot even get the product for several months after the major carriers have been selling it. In response, we sometimes need to offer handsets that are one model behind the most recently released products. At the present time, most ALI-capable CDMA handsets are recently released which we believe puts us at a severe price disadvantage and an occasional disadvantage with respect to availability.

- o Have you encountered any problems in negotiating agreements to obtain these handsets?

The only cases in which we've had problems obtaining any handsets is when major carriers negotiate exclusives or semi-exclusives (as in the case of the T-720 above) that exclude us from being able to get certain handset models.

- o Do you anticipate any problems in marketing ALI-capable handsets to your customers?

At the present time, we do not anticipate any problems in marketing ALI compatible handsets.

4. The estimated date on which Phase II service will first be available in the carrier's network:

The goal of West Coast PCS is to comply with the FCC mandate to provide E911 service within six months of a valid request from the PSAP, or within the timeframe designated by DGS and the PSAPs.

- o What problems are you encountering or do you anticipate encountering in making Phase II service available in your service area or in any part of your service area?

Within the service area of West Coast PCS, DGS will be managing E911 deployment for seven wireless carriers reporting to 15 different PSAPs. DGS is deploying E911 in a sequential manner, starting with the most populated areas (Los Angeles and San Francisco). Some significant problems are still being worked out with the technology and the processes, and it is very likely West Coast PCS will receive PSAP requests before these problems are resolved. Despite the extensive testing that has occurred and experience that has been gained, we will be deploying technology and processes that are completely new to West Coast PCS and nearly all of the PSAPs involved. Additionally, we will be going through a major change in routing 911 calls. Currently, all 911 calls go to just a couple of PSAPs staffed by the California Highway Patrol (CHP). When E911 is deployed, we will be required to route calls to local emergency services in each jurisdiction.

5. Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005:

At this time, we believe the date of December 31, 2005 is achievable.